

FILED

JUN 26 2015

DAVID CREWS, CLERK
BY W. Adams Deputy

UNITED STATES DISTRICT COURT FOR
NORTHERN DISTRICT OF MISSISSIPPI

UNITED STATES OF AMERICA

v.

CRIMINAL NO. 4:15-CR-071

KEYERA BANKS, HERMAN JOHNSON,
BRITTANY JENEL WILLIAMS, KANESHA PHILLIPS,
JIMMY PHILLIPS, COURTNEY SHEPARD,
NADIA SMITH, MARQUITA PHILLIPS,
JEREMIAH PRIMER, LYDIA FRANKLIN, and JEANNIE PHILLIPS

18 U.S.C. § 371
18 U.S.C. § 472
18 U.S.C. § 2

The Grand Jury Charges:

COUNT ONE

From on or about September 7, 2014, until on or about October 21, 2014, in the Northern District of Mississippi and elsewhere, the defendants, KEYERA BANKS, HERMAN JOHNSON, BRITTANY JENEL WILLIAMS, KANESHA PHILLIPS, JIMMY PHILLIPS, COURTNEY SHEPARD, NADIA SMITH, MARQUITA PHILLIPS, JEREMIAH PRIMER, LYDIA FRANKLIN, and JEANNIE PHILLIPS, did knowingly and willfully conspire with each other and with other persons, both known and unknown to the grand jury, to, with intent to defraud, pass, utter, and publish, and attempt to pass, utter, and publish, falsely made, forged, counterfeited and altered obligations and other securities of the United States, to wit: United States Treasury checks, in violation of Title 18, United States Code, Section 472.

Manner and Means of the Conspiracy

It was part of the conspiracy that other individuals not named as defendants herein, known and unknown to the grand jury, would obtain altered United States Treasury checks, wherein the name of the payee and the amount of the check had been altered, and the individual

defendants named herein, with the assistance of other individuals known and unknown to the grand jury, would cash the altered United States Treasury checks at a Walmart store located in Kosciusko, Ridgeland, or Philadelphia, Mississippi.

Overt Acts

In furtherance of the conspiracy and to effect the objects of the conspiracy, the following overt acts, among others, were caused and committed on or about the dates alleged below in the Northern District of Mississippi and elsewhere, by at least one of the co-conspirators herein:

a. On or about September 7, 2014, defendant KEYERA BANKS cashed an altered United States Treasury check in the approximate amount of \$3,718.89 at a Walmart store located in Kosciusko, Mississippi.

b. On or about September 7, 2014, defendant HERMAN JOHNSON cashed an altered United States Treasury check in the approximate amount of \$3,922.60 at a Walmart store located in Kosciusko, Mississippi.

c. On or about October 2, 2014, defendant KEYERA BANKS cashed an altered United States Treasury check in the approximate amount of \$3,980.67 at a Walmart store located in Kosciusko, Mississippi.

d. On or about October 2, 2014, defendant BRITTANY WILLIAMS cashed an altered United States Treasury check in the approximate amount of \$3,922.67 at a Walmart store located in Kosciusko, Mississippi.

e. On or about October 2, 2014, defendant JIMMY PHILLIPS cashed an altered United States Treasury check in the approximate amount of \$3,922.60 at a Walmart store located in Kosciusko, Mississippi.

f. On or about October 2, 2014, defendant KANESHA PHILLIPS cashed an altered United States Treasury check in the approximate amount of \$3,957.00 at a Walmart store located in Kosciusko, Mississippi.

g. On or about October 21, 2014, defendant KANESHA PHILLIPS entered a Walmart store located in Ridgeland, Mississippi, and attempted to cash an altered United States Treasury check in the approximate amount of \$3,890.79.

h. On or about October 19, 2014, defendant COURTNEY SHEPARD cashed an altered United States Treasury check in the approximate amount of \$3,964.00 at a Walmart store located in Ridgeland, Mississippi.

i. On or about October, 2014, defendant JEANIE PHILLIPS cashed an altered United States Treasury check in the approximate amount of \$3,936.13 at a Walmart store located in Ridgeland, Mississippi.

j. On or about October, 2014, defendant JEREMIAH PRIMER cashed an altered United States Treasury check in the approximate amount of \$3,967.47 at a Walmart store located in Ridgeland, Mississippi.

k. On or about October 9, 2014, defendant NADIA SMITH cashed an altered United States Treasury check in the approximate amount of \$3,856.70 at a Walmart store located in Philadelphia, Mississippi.

l. On or about October 10, 2014, defendant LYDIA FRANKLIN cashed an altered United States Treasury check in the approximate amount of \$3,908.57 at a Walmart store located in Philadelphia, Mississippi.

m. On or about October 10, 2014, defendant MARQUITA PHILLIPS entered a Walmart store located in Philadelphia, Mississippi, and attempted to cash an altered United States Treasury check in the approximate amount of \$3,980.67.

All in violation of Title 18, United States Code, Section 371.

COUNT TWO

On or about September 7, 2014, in the Northern District of Mississippi and elsewhere, KEYERA BANKS, defendant, aided and abetted by others known and unknown to the grand jury, with intent to defraud, did knowingly pass, utter, and publish a falsely made, forged, counterfeited and altered obligation of the United States, to wit: a United States Treasury check in the approximate amount of \$3,718.89 in violation of Title 18, United States Code, Sections 472 and 2.

COUNT THREE

On or about September 7, 2014, in the Northern District of Mississippi and elsewhere, HERMAN JOHNSON, defendant, aided and abetted by others known and unknown to the grand jury, with intent to defraud, did knowingly pass, utter, and publish a falsely made, forged, counterfeited and altered obligation of the United States, to wit: a United States Treasury check in the approximate amount of \$3,922.60 in violation of Title 18, United States Code, Sections 472 and 2.

COUNT FOUR

On or about October 2, 2014, in the Northern District of Mississippi and elsewhere, KEYERA BANKS, defendant, aided and abetted by others known and unknown to the grand

jury, with intent to defraud, did knowingly pass, utter, and publish a falsely made, forged, counterfeited and altered obligation of the United States, to wit: a United States Treasury check in the approximate amount of \$3,980.67 in violation of Title 18, United States Code, Sections 472 and 2.

COUNT FIVE

On or about October 2, 2014, in the Northern District of Mississippi and elsewhere, BRITTANY WILLIAMS, defendant, aided and abetted by JIMMY PHILLIPS, defendant, and others known and unknown to the grand jury, with intent to defraud, did knowingly pass, utter, and publish a falsely made, forged, counterfeited and altered obligation of the United States, to wit: a United States Treasury check in the approximate amount of \$3,922.67 in violation of Title 18, United States Code, Sections 472 and 2.

COUNT SIX

On or about October 2, 2014, in the Northern District of Mississippi and elsewhere, JIMMY PHILLIPS, defendant, aided and abetted by others known and unknown to the grand jury, with intent to defraud, did knowingly pass, utter, and publish a falsely made, forged, counterfeited and altered obligation of the United States, to wit: a United States Treasury check in the approximate amount of \$3,922.60 in violation of Title 18, United States Code, Sections 472 and 2.

COUNT SEVEN

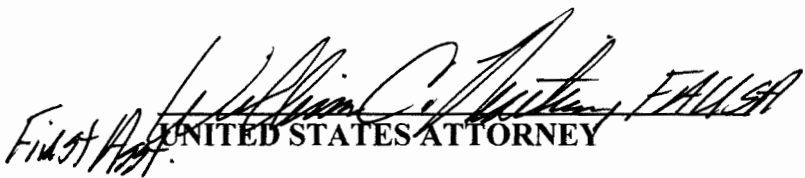
On or about October 2, 2014, in the Northern District of Mississippi and elsewhere, KANESHA PHILLIPS, defendant, aided and abetted by others known and unknown to the grand jury, with intent to defraud, did knowingly pass, utter, and publish a falsely made, forged,

counterfeited and altered obligation of the United States, to wit: a United States Treasury check in the approximate amount of \$3,957.00 in violation of Title 18, United States Code, Sections 472 and 2.

A TRUE BILL:

/s/ *Signature Redacted*

FOREPERSON

First Person

UNITED STATES ATTORNEY